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CLERK US DISTRICT COURT
DISTRICT OF ARIZONA

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

United States of America,
Plaintiff,

vs.

Richard Lee Thomas,
Defendant.

CR24-02717 TUC-RM(EJM)

INDICTMENT

Violations:

18 U.S.C. § 924(a)(1)(A)
(Making a False Statement in Connection
With Acquisition of Firearms)
Counts 1-52

18 U.S.C. §§ 922(a)(1)(A) and
924(a)(1)(D)
(Engaging in the Business of Dealing
Firearms without a License)
Count 53

THE GRAND JURY CHARGES:

COUNTS 1-52

On or about the dates listed below, in the District of Arizona, the Defendant RICHARD LEE THOMAS, in connection with the acquisition of firearms, knowingly made false statements and representations to the businesses listed below, each of which was a Federal Firearms Licensee licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of each business listed below, in

that Defendant stated in writing that his address was on West Limequat Place, Tucson, Arizona, whereas in truth and fact, Defendant's address was on West San Pedro, San Manuel, Arizona;

| Count | Date | FFL | Firearms |
|-------|------------|---------------------------------|---|
| 1 | 4/29/2023 | Quick Trip Pawn | Keltec, PMR-30, .22 caliber, Pistol |
| 2 | 4/13/2023 | Murphy's Gun Shop | Glock, 48, 9mm caliber, Pistol |
| 3 | 3/30/2023 | 1 st Line of Defense | BRG-BURGU metal, BRG9 Elite, 9mm caliber, Pistol |
| 4 | 3/30/2023 | 1 st Line of Defense | Glock, 22 Gen 4, .40 caliber, Pistol |
| 5 | 3/22/2023 | 1 st Line of Defense | Armstrong/Rock Island Armory, M1911A1, 9mm, Pistol |
| 6 | 3/9/2023 | Murphy's Gun Shop | Colt, Huntsman, 22LR caliber, Pistol |
| 7 | 2/24/2023 | Red Training Solutions | Unbrandedar LLC, unknown model, multi caliber, Rifle |
| 8 | 2/24/2023 | Red Training Solutions | Unbrandedar LLC, unknown model, multi caliber, Rifle, |
| 9 | 2/24/2023 | Red Training Solutions | Unbrandedar LLC, unknown model, multi caliber, Rifle |
| 10 | 2/18/2023 | Diamondback Shooting Sports | Marlin, 336-RC, 30-30, Rifle |
| 11 | 1/17/2023 | Murphy's Gun Shop | Bersa RSA, Thunder, .380 ACP, Pistol |
| 12 | 12/24/2022 | Murphy's Gun Shop | Smith & Wesson, M&P 380 Shield EZ, .380ACP, Pistol |
| 13 | 11/29/2022 | Murphy's Gun Shop | Carl Gustav, 1896, 6.5x55, Rifle |
| 14 | 10/22/2022 | Murphy's Gun Shop | BTC/Norinco, SKS, 7.62x39, Rifle |

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|----|----|------------|---------------------------------|--|
| 1 | 15 | 5/5/2022 | Catalina Pawn | PSA, PA-15, Multi caliber, Receiver |
| 2 | | | | Palmetto State Armory, PA-15, multi caliber, |
| 3 | 16 | 4/19/2022 | Catalina Pawn | Receiver |
| 4 | 17 | 2/25/2022 | Catalina Pawn | Bersa/RSA, Thunder 380, .380 ACP, Pistol |
| 5 | 18 | 2/16/2022 | Murphy's Gun Shop | Ruger, LCP, .380 caliber, Pistol |
| 6 | | | | Palmetto State Armory, KS-4762, 7.62x39, |
| 7 | 19 | 1/3/2022 | Quick Trip Pawn | Pistol |
| 8 | | | | Bear Creek Arsenal, BCA15, 5.56 nato |
| 9 | 20 | 12/8/2021 | Catalina Pawn | caliber, Pistol |
| 10 | 21 | 12/8/2021 | Murphy's Gun Shop | Winchester, Ranger, 30-30, Rifle |
| 11 | 22 | 12/8/2021 | Murphy's Gun Shop | H&R Inc, 904, .22 LR, Revolver |
| 12 | | | | Taurus, Circuit Judge, 45 caliber, |
| 13 | 23 | 11/29/2021 | Murphy's Gun Shop | Rifle/Shotgun |
| 14 | 24 | 11/20/2021 | Catalina Pawn | Ruger, EC9S, 9x19 caliber, Pistol |
| 15 | | | | Anderson Manufacturing, AM-15, multi |
| 16 | 25 | 11/16/2021 | 1 st Line of Defense | caliber, Receiver |
| 17 | | | | Rock Island Armory, M1911A 380, .380, |
| 18 | 26 | 11/11/2021 | Quick Trip Pawn | Pistol |
| 19 | 27 | 11/11/2021 | Murphy's Gun Shop | Walther, P-22, .22 LR, Pistol |
| 20 | 28 | 11/5/2021 | Quick Trip Pawn | Walther, PPK15, .22LR, Pistol |
| 21 | 29 | 11/5/2021 | Murphy's Gun Shop | Ruger, LCP II, .380 ACP, Pistol |
| 22 | 30 | 10/30/2021 | Murphy's Gun Shop | Winchester, 94, 30-30, Rifle |
| 23 | 31 | 10/21/2021 | 1 st Line of Defense | Ruger, LCP, .380 caliber, Pistol |
| 24 | 32 | 10/8/2021 | Murphy's Gun Shop | Winchester, Ranger, 30-30, Rifle |

| | | | | |
|----|----|------------|---------------------------------|---|
| 1 | 33 | 9/27/2021 | 1 st Line of Defense | Taurus, 856, .38 special caliber, Revolver |
| 2 | 34 | 8/28/2021 | Murphy's Gun Shop | Browning, Buckmark, .22LR, Pistol |
| 3 | 35 | 8/28/2021 | Murphy's Gun Shop | Ruger, American, 22-250 caliber, Rifle |
| 4 | 36 | 8/26/2021 | Catalina Pawn | SCCY, CPX-1, 9mm caliber, pistol |
| 5 | 37 | 8/26/2021 | 1 st Line of Defense | Keltec, KS7, 12-gauge, Shotgun |
| 6 | 38 | 8/19/2021 | 1 st Line of Defense | Taurus, 860, .38 special caliber, Revolver |
| 7 | 39 | 8/12/2021 | 1 st Line of Defense | Mossberg, Maverick 88 Security, 12-gauge, Shotgun |
| 8 | 40 | 8/5/2021 | Murphy's Gun Shop | Savage, 29, .22 LR, Rifle |
| 9 | 41 | 8/5/2021 | 1 st Line of Defense | Palmetto State Armory, PA-15, multi caliber, Receiver |
| 10 | 42 | 7/30/2021 | 1 st Line of Defense | Ruger, EC9S, 9mm caliber, Pistol |
| 11 | 43 | 7/23/2021 | 1 st Line of Defense | Extar, EP9, 9mm caliber, Pistol |
| 12 | 44 | 7/15/2021 | 1 st Line of Defense | Palmetto State Armory, PA-15, 5.56 nato caliber, Pistol |
| 13 | 45 | 7/10/2021 | 1 st Line of Defense | Extar, EP9, 9mm caliber, Pistol |
| 14 | 46 | 2/11/2021 | 1 st Line of Defense | Nova Modul Chiappa Firearms, PAK-9, 9mm, Pistol |
| 15 | 47 | 12/12/2020 | 1 st Line of Defense | ATI, Omni Hybrid Max, 5.56 caliber, Pistol |
| 16 | 48 | 10/15/2020 | 1 st Line of Defense | ATI, Omni Hybrid Max, 5.56 caliber, Pistol |
| 17 | 49 | 9/28/2020 | 1 st Line of Defense | ATI, Omni Hybrid Max X, 5.56 caliber, Pistol |
| 18 | 50 | 6/30/2020 | 1 st Line of Defense | ATI, OMNI, 300 ACC blackout caliber, Pistol |
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| 1 | | | Riley Defense Inc, RAK47 Classic, 7.62x39 |
| 2 | 51 | 6/20/2020 | 1 st Line of Defense caliber, Rifle |
| 3 | 52 | 5/9/2020 | 1 st Line of Defense EEA, MC1911SC, .45 ACP caliber, Pistol |

4
5 In violation of Title 18, United States Code, Section 924(a)(1)(A).

6 **COUNT 53**

7 Between on or about May 9, 2020, and on or about April 29, 2023, in the District of
8 Arizona, Defendant RICHARD LEE THOMAS, not being a licensed dealer of firearms
9 within the meaning of Chapter 44, Title 18, United States Code, did willfully engage in the
10 business of dealing firearms;

11 In violation of Title 18, United States Code, Sections 922(a)(1)(A) and
12 924(a)(1)(D).

13 **FORFEITURE ALLEGATION**

14 Upon conviction of Counts 1 through 53 of the Superseding Indictment, the
15 defendant, RICHARD LEE THOMAS, shall forfeit to the United States pursuant to Title
16 18, United States Code, Section 924(d), and Title 28, United States Code, Section 2461(c),
17 any firearms involved in the commission of the offense, including, but not limited to:

| # | Firearms | Serial Number |
|----|--|----------------|
| 18 | 1 Keltec, PMR-30, .22 caliber, Pistol | WY4C76 |
| 19 | 2 Glock, 48, 9mm caliber, Pistol | BYRW681 |
| 20 | 3 BRG-BURGU metal, BRG9 Elite, 9mm caliber, Pistol | TG019-22C11806 |
| 21 | 4 Glock, 22 Gen 4, .40 caliber, Pistol | TUV390 |
| 22 | 5 Armscor/Rock Island Armory, M1911A1, 9mm, Pistol | RIA2641098 |
| 23 | 6 Colt, Huntsman, 22LR caliber, Pistol | 1038633-S |
| 24 | 7 Unbrandedar LLC, unknown model, multi caliber, Rifle | UT-07676 |
| 25 | 8 Unbrandedar LLC, unknown model, multi caliber, Rifle | UT-07695 |
| 26 | 9 Unbrandedar LLC, unknown model, multi caliber, Rifle | UT-07700 |
| 27 | 10 Marlin, 336-RC, 30-30, Rifle | 21115985 |
| 28 | 11 Bersa RSA, Thunder, .380 ACP, Pistol | H79856 |
| | 12 Smith & Wesson, M&P 380 Shield EZ, .380ACP, Pistol | RDM4477 |

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|----|---|--------------|
| 13 | Carl Gustav, 1896, 6.5x55, Rifle | 58671 |
| 14 | BTC/Norinco, SKS, 7.62x39, Rifle | 65087 |
| 15 | PSA, PA-15, Multi caliber, Receiver | SCB944626 |
| 16 | Palmetto State Armory, PA-15, multi caliber, Receiver | SCD448144 |
| 17 | Bersa/RSA, Thunder 380, .380 ACP, Pistol | J67758 |
| 18 | Ruger, LCP, .380 caliber, Pistol | 379009117 |
| 19 | Palmetto State Armory, KS-4762, 7.62x39, Pistol | KSG2016325 |
| 20 | Bear Creek Arsenal, BCA15, 5.56 nato caliber, Pistol | 47053 |
| 21 | Winchester, Ranger, 30-30, Rifle | 6079706 |
| 22 | H&R Inc, 904, .22 LR, Revolver | AY096261 |
| 23 | Taurus, Circuit Judge, .45 caliber, Rifle/shotgun | LYS580 |
| 24 | Ruger, EC9S, 9x19 caliber, Pistol | 459-78603 |
| 25 | Anderson Manufacturing, AM-15, multi caliber, Receiver | 21139694 |
| 26 | Rock Island Armory, M1911A 380, .380, Pistol | RIA2343200 |
| 27 | Walther, P-22, .22 LR, Pistol | WA348150 |
| 28 | Walther, PPK15, .22LR, Pistol | WF062657 |
| 29 | Ruger, LCP II, .380 ACP, Pistol | 380248318 |
| 30 | Winchester, 94, 30-30, Rifle | TR26914 |
| 31 | Ruger, LCP, .380 caliber, Pistol | 372008574 |
| 32 | Winchester, Ranger, 30-30, Rifle | 3844435 |
| 33 | Taurus, 856, .38 special caliber, Revolver | ACH118097 |
| 34 | Browning, Buckmark, .22LR, Pistol | 655 PN 25589 |
| 35 | Ruger, American, 22-250 caliber, Rifle | 694-87737 |
| 36 | SCCY, CPX-1, 9mm caliber, Pistol | C156915 |
| 37 | Keltec, KS7, 12-gauge, Shotgun | QBR30 |
| 38 | Taurus, 860, .38 special caliber, Revolver | ACH137472 |
| 39 | Mossberg, Maverick 88 Security, 12 gauge, Shotgun | MV0628390 |
| 40 | Savage, 29, .22 LR caliber, Rifle | 4092 |
| 41 | Palmetto State Armory, PA-15, multi caliber, Receiver | SCB100520 |
| 42 | Ruger, EC9S, 9mm caliber, Pistol | 459-47334 |
| 43 | Extar, EP9, 9mm caliber, Pistol | P18106 |
| 44 | Palmetto State Armory, PA-15, 5.56 nato caliber, Pistol | SCD965451 |
| 45 | Extar, EP9, 9mm caliber, Pistol | P17649 |
| 46 | Nova Modul Chiappa Firearms, PAK-9, 9mm, Pistol | RON2024388 |

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| 47 | ATI, Omni Hybrid Max, 5.56 caliber, Pistol | NS266723 |
| 48 | ATI, Omni Hybrid Max, 5.56 caliber, Pistol | 266219 |
| 49 | ATI, Omni Hybrid Max X, 5.56 caliber, Pistol | NS266511 |
| 50 | ATI, OMNI, 300 ACC blackout caliber, Pistol | NS259339 |
| 51 | Riley Defense Inc, RAK47 Classic, 7.62x39 caliber, Rifle | B16685 |
| 52 | EEA, MC1911SC, .45 ACP caliber, Pistol | T6368- 20BF00177 |

If any of the property described above, as a result of any act or omission of the defendant: a) cannot be located upon the exercise of due diligence; b) has been transferred or sold to, or deposited with, a third party; c) has been placed beyond the jurisdiction of the court; d) has been substantially diminished in value; or e) has been commingled with other property which cannot be divided without difficulty, it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property, including, but not limited to, all property, both real and personal, owned by the defendant.

All pursuant to Title 18, United States Code, Section 924(d), Title 28, United States Code, Section 2461(c) and Rule 32.2(a), Federal Rules of Criminal Procedure.

A TRUE BILL

/ s /

FOREPERSON OF THE GRAND JURY
Dated: May 15, 2024

REDACTED FOR
PUBLIC DISCLOSURE

GARY M. RESTAINO
United States Attorney
District of Arizona

/ s /

BRANDON BOLLING
Assistant U.S. Attorney